



## MEMO ENDORSED

MURIEL GOODE-TRUFANT  
Corporation Counsel

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The requests are granted. The conference currently scheduled for March 20, 2025 is adjourned to March 27, 2025 at 10:00 a.m. To the extent Plaintiffs' March 18 response requires a response from Defendants, Defendants' deadline to respond is extended to March 26, 2025.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: March 13, 2025

New York, New York

Re: *D.W., et al. v. New York City Department of Education, et al.*, No. 23-cv-3179

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for the New York City Department of Education and David C. Banks (in his official capacity) (collectively, "NYCDOE" or "Defendants") in this action. I write pursuant to Rule 1(E) of Your Honor's Individual Practices to respectfully request a brief adjournment of the telephonic pre-motion conference (the "Conference") currently scheduled for March 20, 2025 at 10:00 a.m. until the week of March 24, 2025.

I will be out of the country on vacation the week of March 17, 2025 and will be unavailable to participate in the Conference, which concerns Defendants' pre-motion letter seeking a stay of discovery. (ECF No. 71.) This is Defendants' first request for an adjournment of the Conference, and the adjournment will not affect any other deadlines in this case. Plaintiffs do not oppose Defendants' request for an adjournment. Finally, to the extent Plaintiffs' March 18 opposition contains any applications for relief from the Court requiring a response from Defendants under the Court's Individual Practices, Defendants respectfully request that their time to respond be extended from March 21, 2025 until March 26, 2025.

Thank you for your consideration of the foregoing.

Respectfully submitted,

/s/ Eric B. Hiatt

Eric B. Hiatt

Assistant Corporation Counsel

cc: All counsel of record  
(via ECF)